

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
101 CALIFORNIA STREET, SUITE 2300
SAN FRANCISCO, CALIFORNIA 94111

LYN R. AGRE (SBN 178218)
MARGARET A. ZIEMIANEK (SBN 233418)
GUNNAR K. MARTZ (SBN 300852)
KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
101 California Street, Suite 2300
San Francisco, California 94111
Telephone: (415) 655-4308
Facsimile: (415) 398-5030
lagre@kasowitz.com
mziemianek@kasowitz.com
gmartz@kasowitz.com

Attorneys for Defendants
THE RELATED COMPANIES, INC.,
THIRD AND MISSION ASSOCIATES, LLC,
and RELATED MANAGEMENT COMPANY, L.P.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PETER HOLLAND and KRISTEN
HOLLAND,

Plaintiffs,

v.

THE RELATED COMPANIES, INC.;
THIRD AND MISSION ASSOCIATES,
LLC; RELATED MANAGEMENT
COMPANY, L.P.; DOES 1 through 10,
inclusive

Defendants.

Case No. 4:15-CV-03220 JSW

Hon. Judge Jeffery S. White

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING DEADLINES SET
IN APRIL 29, 2016 ORDER
(DKT. NO. 65)
AS MODIFIED**

By and through their attorneys of record, Defendants THE RELATED COMPANIES, INC., THIRD AND MISSION ASSOCIATES, LLC, and RELATED MANAGEMENT COMPANY, L.P. (collectively, “Defendants”) and Plaintiffs PETER HOLLAND and KRISTIN HOLLAND (“Plaintiffs”) hereby stipulate and agree as follows:

WHEREAS, the Court entered an order on April 29, 2016 (Dkt. No. 65), setting case deadlines pursuant to stipulation of the parties;

WHEREAS, the current schedule is as follows:

Fact discovery cut-off	May 23, 2016
Designation of experts	May 23, 2016
Expert discovery cut-off	June 20, 2016
Hearing of dispositive motions	July 8, 2016
Pretrial conference	September 26, 2016 at 2:00 p.m.
Jury selection	October 26, 2016 at 8:00 a.m.
Trial	October 31, 2016 at 8:00 a.m.

WHEREAS, Defendants’ counsel and Plaintiffs’ counsel have met and conferred, and agree that extension of certain of the deadlines in the current scheduling order is warranted.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto and their respective undersigned attorneys, as follows:

The parties respectfully jointly request that the Court continue the deadlines set forth in the April 29, 2016 Order as follows:

Fact discovery cut-off	May 27, 2016 ¹
Designation of experts	June 22, 2016
Expert discovery cut-off	July 15, 2016
Hearing of dispositive motions	July 22, 2016

¹ Thereby extending the deadline to file discovery motions to June 3, 2016, pursuant to Local Rule 37-3.

1 The parties propose no change to the other deadlines.

2
3 IT IS SO STIPULATED.

4 Respectfully submitted,

5
6
7 DATED: May 27, 2016

/s/ Lyn R. Agre

Lyn R. Agre
KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

9 Attorneys for Defendants
10 THE RELATED COMPANIES, INC.,
11 THIRD AND MISSION ASSOCIATES, LLC, and
12 RELATED MANAGEMENT COMPANY, L.P.

13 DATED: May 27, 2016

/s/ Celia McGuinness

14 Paul L. Rein
15 Celia McGuinness
16 LAW OFFICES OF PAUL L. REIN

17 Steven L. Derby
18 THE DERBY LAW FIRM P.C.

19 Attorneys for Plaintiffs
20 PETER HOLLAND and
21 KRISTEN HOLLAND
22
23
24
25
26
27
28

CERTIFICATION OF COMPLIANCE WITH L.R. 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I hereby certify that the content of this document is acceptable to Celia McGuinness and Steven L. Derby, counsel for Plaintiffs, and that I have obtained their authorization to affix their respective electronic signatures to this document.

DATED: May 27, 2016

/s/ Lyn R. Agre

Lyn R. Agre

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

Attorneys for Defendants

THE RELATED COMPANIES, INC.,

THIRD AND MISSION ASSOCIATES, LLC, and

RELATED MANAGEMENT COMPANY, L.P.


~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation, it is hereby ordered that the following deadlines set forth in the April 29, 2016 Order are vacated and reset as follows:

Fact discovery cut-off	May 27, 2016
Designation of experts	June 22, 2016
Expert discovery cut-off	July 15, 2016
Hearing of dispositive motions	July 22, 2016
Pretrial conference	September 26, 2016 at 2:00 p.m.
Jury selection	October 26, 2016 at 8:00 a.m.
Trial	October 31, 2016 at 8:00 a.m.

IT IS SO ORDERED. The parties shall review this Court's deadlines relating to pre-trial conferences, including the deadlines by which they must exchange motions in limine. The Court reserves the right to continue the pretrial conference and trial if required.

DATED: May 31, 2016


Honorable Jeffrey S. White